PRESENTMENT

CASE NO.	
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STATE OF TENNESSEE VS.

JULIE BEALE (A)

SAMUEL T. BEALE IV (B)

THEFT OF PROPERTY (\$60,000 OR MORE, LESS THAN \$250,000.00 (A)
THEFT OF PROPERTY (\$60,000 OR MORE, LESS THAN \$250,000.00) (B)
CONSPIRACY TO COMMITT THEFT OF PROPERTY (\$60,000 OR MORE, LESS THAN \$250,000.00) (A & B)

MONEY LAUNDERING (A)

FINANCIAL EXPLOITATION OF ELDERLY OR VULNERABLE PERSON (B)
THEFT OF PROPERTY (\$2500.00 OR MORE, LESS THAN \$10,000.00) (B) (ALTERNATE COUNT)

TN COMPTROLLER OF THE TREASURE AND BRADY BENNETT, OFFICE OF INSEPCTOR GENERAL FOR U.S. DEPARTMENT OF HOUSING & URBAN DEVELOPMENT, PROSECUTOR Witnesses sworn by me in the presence CLERK: Summon named witnesses of the Grand Jury for the State of Tennessee. 2021 Ken Baldwin Foreperson of the Grand Jury District Attorney General Bond: \$30,000 day of Filed this Criminal Court Judge Clerk

A TRUE BILL Foreperson of the Grand Jury

Mary H. Brossors Fauru Grad Mergen Gulle Am Bulfield Randy K Ancher

Roberca Ambrey Cessica Blowns Christin Augis Crika aller Learne Dong

STATE OF TENNESSEE, COUNTY OF WASHINGTON

CRIMINAL COURT FOR WASHINGTON COUNTY, TENNESSEE

CHARGE: THEFT OF PROPERTY (\$60,000 OR MORE, LESS THAN \$250,000.00)

The Grand Jurors for the State of Tennessee, upon their oaths, present that **JULIE BEALE**, between the 23rd day of November, 2013 and the 1st day of March, 2018, in the State and County aforesaid, did commit the offense of theft of property by knowingly obtaining or exercising control over property, to wit; \$119,582.65, one hundred nineteen thousand, five hundred eighty two dollars and sixty five cents, valued in the amount of sixty thousand dollars (\$60,000.00) or more, but less than two hundred fifty thousand dollars (\$250,000.00) the property of Appalachian Region Coalition on Homelessness, without the owner's effective consent and with the intent to deprive the owner thereof; a class B felony, in violation of Section 39-14-103 of the Tennessee Code Annotated, and against the peace and dignity of the State of Tennessee.

COUNT TWO

CHARGE: THEFT OF PROPERTY (\$60,000 OR MORE, LESS THAN \$250,000.00)

And the Grand Jurors aforesaid, upon their oaths aforesaid, do further present that **SAMUEL T. BEALE IV**, between the 23rd day of November, 2013 and the 1st day of March, 2018, in the State and County aforesaid, did unlawfully, commit the offense of theft of property by knowingly obtaining or exercising control over property, to wit; \$76,005.06, seventy six thousand five dollars and six cents, valued in the amount of sixty thousand dollars (\$60,000.00) or more, but less than two hundred fifty thousand dollars (\$250,000.00) the property of Appalachian Regional Coalition on Homelessness, without the owner's effective consent and with the intent to deprive the owner thereof; a class B felony, in violation of Section 39-14-103 of the Tennessee Code Annotated, and against the peace and dignity of the State of Tennessee.

STATE OF TENNESSEE, COUNTY OF WASHINGTON CRIMINAL COURT FOR WASHINGTON COUNTY, TENNESSEE

COUNT THREE

CHARGE: CONSPIRACY TO COMMITT THEFT OF PROPERTY (\$60,000 OR MORE, LESS THAN \$250,000.00)

And the Grand Jurors aforesaid, upon their oaths aforesaid, do further present that **JULIE BEALE AND SAMUEL T. BEAL IV**, between the 23rd day of November, 2013 and the 1st day of March, 2018, and on diverse dates between that date and March 01, 2018, in Washington County, Tennessee, did unlawfully and knowingly conspire and agree with one another that one or more of them would engage in conduct that constituted the offense of \$60,000.00 or more, but less than \$250,000.00, with each defendant having the culpable mental state require for the commission of the offense, and in furtherance of the conspiracy, at least one (1) defendant committed one of the following overt acts:

- 1. Submit false or fraudulent quote and/or invoices for services rendered,
- 2. Forge signatures on financial instruments to make unauthorized payments to either or both defendants, and their family members
- 3. Make false entries into Appalachian Regional Coalition on Homelessness records to conceal unauthorized payments,
- 4. Falsify documents to conceal unauthorized payments to either or both defendants, or
- 5. Use unauthorized checks, unauthorized Appalachian Regional Coalition on Homelessness payments, or Appalachian Regional Coalition on Homelessness debit card for the unauthorized pecuniary benefit of either or both defendants, or their family members.

Said conspiracy being a class C felony in violation of T.C.A. § 39-14-103 and T.C.A. § 39-12-103, and against the peace and dignity of the State of Tennessee.

STATE OF TENNESSEE, COUNTY OF WASHINGTON CRIMINAL COURT FOR WASHINGTON COUNTY, TENNESSEE

COUNT FOUR

CHARGE: MONEY LAUNDERING

And the Grand Jurors aforesaid, upon their oaths aforesaid, do further present that **JULIE BEALE**, between the 23rd day of November, 2013 and the 1st day of March, 2018, in the State and County aforesaid, did knowingly use, conspire to use, or attempt to use proceeds derived directly or indirectly from a theft to conduct or attempt to conduct a financial transaction or make other disposition with the intent to conceal or disguise the nature of the criminally derived proceeds, a class B felony, in violation of Section 39-14-903(a) of the Tennessee Code Annotated, and against the peace and dignity of the State of Tennessee.

COUNT FIVE

CHARGE: FINANCIAL EXPLOITATION OF ELDERLY OR VULNERABLE PERSON

And the Grand Jurors aforesaid, upon their oaths aforesaid, do further present that **SAMUEL T. BEALE IV**, between the 8th day of June, 2017 and the 3rd day of August, 2017, in the State and County aforesaid, did unlawfully, commit the offense of financial exploitation of elderly or vulnerable person by knowingly and unlawfully financially exploiting an elderly or vulnerable adult, in the amount of two thousand five hundred dollars (\$2,500.00), but less than ten thousand dollars (\$10,000.00); a class C felony, in violation of Section 39-15-502 of the Tennessee Code Annotated, and against the peace and dignity of the State of Tennessee.

STATE OF TENNESSEE, COUNTY OF WASHINGTON CRIMINAL COURT FOR WASHINGTON COUNTY, TENNESSEE

COUNT SIX (ALTERNATE COUNT)

CHARGE: THEFT OF PROPERTY (\$2500.00 OR MORE, LESS THAN \$10,000.00)

And the Grand Jurors aforesaid, upon their oaths aforesaid, do further present that **SAMUEL T. BEALE IV**, between the 8th day of June, 2017 and the 3rd day of August, 2017, in the State and County aforesaid, did unlawfully, commit the offense of theft of property by knowingly obtaining or exercising control over property, to wit; \$2,863.17, two thousand eight hundred sixty three dollars and seventeen cents, valued in the amount of two thousand five hundred dollars (\$2,500.00) or more, but less than ten thousand dollars (\$10,000.00) the property of ________, without the owner's effective consent and with the intent to deprive the owner thereof; a class D felony, in violation of Section 39-14-103 of the Tennessee Code Annotated, and against the peace and dignity of the State of Tennessee.

DISTRICT ATTORNEY GENERAL on ton

STATE OF TENNESSEE VS. JULIE BEALE (A) SAMUEL T. BEALE (B)

WITNESSES

TN COMPTROLLER OF THE TREASURY

BRADY BENNETT
OFFICE OF INSPECTOR GENERAL FOR
U.S. DEPARTMENT OF HOUSING AND
URBAN DEVELOPMENT

PRESENTMENT

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FINANCIAL EXPLOITATION OF ELDERLY OR VULNERABLE PERSON (B)
THEFT OF PROPERTY (\$2500.00 OR MORE, LESS THAN \$10,000.00) (B) (ALTERNATE COUNT)

TN COMPTROLLER OF THE TREASURE AND BRADY BENNETT,

CLERK: Summon named witnesses for the State of Tennessee.

Ken Baldwin
District Attorney General

Witnesses sworn by me in the presence of the Grand Jury

Filed this day of the Grand Jury

Foreperson of the Grand Jury

A TRUE BILL Foreperson of the Grand Jury

STATE OF TENNESSEE, COUNTY OF WASHINGTON

CRIMINAL COURT FOR WASHINGTON COUNTY, TENNESSEE

CHARGE: THEFT OF PROPERTY (\$60,000 OR MORE, LESS THAN \$250,000.00)

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STATE OF TENNESSEE, COUNTY OF WASHINGTON CRIMINAL COURT FOR WASHINGTON COUNTY, TENNESSEE

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PRESENTMENT NUMBER

STATE OF TENNESSEE, COUNTY OF WASHINGTON CRIMINAL COURT FOR WASHINGTON COUNTY, TENNESSEE

COUNT FOUR

CHARGE: MONEY LAUNDERING

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STATE OF TENNESSEE, COUNTY OF WASHINGTON

CRIMINAL COURT FOR WASHINGTON COUNTY, TENNESSEE

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WITNESSES

TN COMPTROLLER OF THE TREASURY

BRADY BENNETT OFFICE OF INSPECTOR GENERAL FOR U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT